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*Attorneys for Defendant The Guida-Seibert Dairy Company*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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TIFFANEE GOULD, individually : Case No.: 1:22-cv-01861-NLH-AMD  
and on behalf of her minor son, A.J.. :  
*et al.*, : **DEFENDANT THE GUIDA-  
SEIBERT DAIRY COMPANY'S  
NOTICE OF MOTION TO  
STRIKE CLASS ALLEGATIONS  
PURSUANT TO FED. R. CIV. P.  
12(f) AND 23(a)-(b), (c)(1)(A), AND  
(d)(1)(D)**  
Plaintiffs, :  
v. : Motion Date: June 21, 2022  
THE GUIDA-SEIBERT DAIRY :  
COMPANY. *et al.*, :  
Defendants. :  
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**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law, the Declaration of Philip A. Goldstein and the exhibit(s) annexed thereto, and upon all prior pleadings and proceedings in this action, Defendant The Guida-Seibert Dairy Company (“Defendant”), shall move this Court before the Honorable Noel L. Hillman, U.S.D.J. at the Mitchell H. Cohen Building & U.S. Courthouse located at 4<sup>th</sup> & Cooper Streets, Camden, NJ 08101, on June 23, 2022, or as soon thereafter as counsel may be heard, for an Order pursuant to Rules 12(f) and 23(a)-(b), (c)(1)(A),

and (d)(1)(D) of the Federal Rules of Civil Procedure granting Defendant's motion to strike Plaintiffs' class allegations with prejudice in their entirety, and for such other, further or different relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested if this Motion is opposed, pursuant to Local Civil Rule 78.1(b); and

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is attached hereto.

Dated: New York, New York  
May 23, 2022

*/s/ Philip A. Goldstein*  
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